

Lyew, Sandra

August 28, 2015

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1 These are specific codes that go in, so
2 it identifies what was received.

3 Q. And in this case nothing was received
4 because there was no entry there?

5 MR. MANNING: Object to the form.

6 THE WITNESS: Again, this is an Equifax
7 form.

8 BY MR. NOLAN:

9 Q. I'm sorry. I'm asking about OCWEN 1665
10 where it says reporting received from credit bureau
11 and there is no entry next to that.

12 A. It says blank. And then it says
13 reporting to credit bureau. And beside it, it says
14 verified, hence borrower is responsible. Discrep --
15 and below it, it says discrepancy (name, address,
16 Social Security number). And details.

17 And then it goes all the way down as far
18 as form completed and sent electronically. It is not
19 mailed. Borrower automated CDV. Control number and
20 subscriber code is the same.

21 Q. That's getting into a different entry by
22 a different employee, it appears.

23 A. No, it's not. It's the same employee.

24 Q. It says Rajkumar Singh at 2:08 when we
25 get back into the control number. Or am I bumping

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1 too far ahead of you?

2 A. Beside it, it says Harish.

3 Q. I think I went down to the next one. I
4 apologize for that.

5 A. Okay.

6 Q. So the second entry -- let me back up
7 first, though. We're at the top of the -- the second
8 line says reporting to credit bureau verified, hence
9 borrower is responsible?

10 A. That is correct.

11 Q. Is that what would have been reported to
12 the credit reporting agencies?

13 A. And then it says -- that's part of
14 the -- part of the response that would go back to the
15 credit agency. And then it says --

16 Q. There is a second entry that's
17 substantially similar to the prior entry, from my
18 perspective, and I was wondering if you could --

19 A. Then it says borrower's concern with
20 reporting. And then how it was received, not
21 his/hers. Provide or confirm ID. And then -- yes.
22 It looks like it's a repeat. And then you have
23 another employee.

24 Q. Before we get to the second employee,
25 there is an entry at 1:40:47 a.m. from Harish Rao

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1 again?

2 A. Correct.

3 Q. That appears to state invalid/erroneous
4 CR dispute.

5 Can you explain what he would have been
6 referring to?

7 A. To my knowledge, how I see it, that the
8 dispute was not -- as far as a valid dispute, other
9 than not his/hers on how it was received to OCWEN.

10 Q. Okay.

11 A. So then it goes down by another
12 employee --

13 Q. Well, before we get there, I want to go
14 back to the Equifax form, the document number 30. In
15 the top left block it says the responder name is
16 Harish Rao. And that's the OCWEN employee, correct?

17 A. Yes.

18 Q. And under that, to the right, it says
19 the response date is March 20th, 2013, correct?

20 A. Yes.

21 Q. And that corresponds with the OCWEN
22 comment log 1665, correct?

23 A. Okay. 1664 and 65.

24 Q. So that response occurred on March 20th,
25 2013?

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1 **A. Correct.**

2 Q. And the response code was verified as
3 reported, correct?

4 **A. Correct.**

5 Q. Now, this Equifax 30 lists the account
6 as -- I'm going down into the middle of the page.
7 I'm skipping over the consumer identity info.
8 Account type is 08. Can you identify what that code
9 means?

10 **A. No. This is an Equifax form.**

11 Q. Okay. And the date open was
12 August 1999?

13 **A. That's what that form says.**

14 Q. And the type and rate is M minus. Can
15 you identify that?

16 **A. No.**

17 Q. Can you identify the narrative codes?

18 **A. No.**

19 Q. Now, this form has a past due amount,
20 correct?

21 **A. It was past due at the time.**

22 Q. And it lists the past due amount as
23 \$6,128, correct?

24 **A. Based on the exhibit that you provided**
25 **to me and what is shown here, it seems to be**

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1 **accurate.**

2 Q. Just so we're clear, let's take a look
3 at the exhibit.

4 A. Okay. The exhibit, which was
5 Exhibit 4 --

6 Q. The --

7 A. The response letter, March 18, 2013,
8 response to the borrower in response to the
9 borrower's account. And I mentioned earlier in my
10 testimony that the borrower was in default at that
11 time. The loan was not current.

12 Q. In March of 2012, correct?

13 A. That is correct.

14 Q. Now, this form here was submitted in
15 March 2013, correct?

16 A. Which form?

17 Q. The Equifax page 30.

18 A. The response -- are you talking about
19 the response date?

20 Q. Yes.

21 A. Okay. The response date is March 20th
22 of 2013.

23 Q. So that's when OCWEN and Harish Rao
24 reviewed Mr. Daugherty's account based on this
25 dispute, correct?

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1 A. Identifying that it was his account.

2 Q. And they verified as reported, correct?

3 A. Yes. I see that.

4 Q. And what was reported was that he was
5 past due in the amount of \$6,128 on that date?

6 A. In March 2012.

7 Q. This report is dated -- was submitted --
8 was created in March of 2013.

9 A. Correct. But below it says data
10 information as far as his latest was in March 2012.

11 Q. Where do you see that?

12 A. Further down. It says date of account
13 due.

14 Q. I see date of account info in March of
15 2012. Is that what you're referring to?

16 A. That's info. Yes. And last payment --
17 last payment date, January 2012. That's below the
18 \$6,128.

19 Q. And then, under comments below, it
20 states that foreclosure proceedings started, correct?

21 A. At that time.

22 Q. Well, at the time is March of 2013.

23 A. They're speaking about the last time it
24 was reported.

25 Q. And OCWEN verified this report, correct?

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1 A. Well, once we go into how it was
2 reported, the e-Oscar system. This was an Equifax --
3 and at the time this came in, in March 2013, they're
4 identifying as far as the -- if any -- that this
5 account was verified, this belongs to the borrower,
6 and the borrower was past due March 2012.

7 Q. Correct.

8 A. And foreclosure proceedings did begin at
9 that point.

10 Q. Why did OCWEN verify that report?

11 MR. MANNING: Objection. Asked and
12 answered.

13 You can answer.

14 THE WITNESS: Because you asked me in
15 regards to the comment log, March of 2013 based on
16 Exhibit 4, Exhibit 5 which is the comment log, and
17 you now provided to me an Equifax form.

18 BY MR. NOLAN:

19 Q. Okay. The second Equifax form there,
20 page number 34, has a different control number. The
21 control number, composite ends in 87, whereas the
22 first one ends in 88. But it has the same subscriber
23 code, correct?

24 A. Yes.

25 Q. And it has the same date created of

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1 March 19, 2013, correct?

2 A. Yes.

3 Q. This one was responded to by a different
4 OCWEN employee named Rajkumar, correct?

5 A. Yes.

6 Q. If we go back to OCWEN 1665, on
7 March 20th, 2013 at 2:08:50 Rajkumar Singh has
8 entries regarding this account, correct?

9 A. Yes.

10 Q. Regarding the same subscriber code and
11 control number shown on the Equifax page, correct?

12 A. Yes.

13 Q. Why were two separate employees
14 reviewing the same account number with the same
15 subscriber code?

16 MR. MANNING: Object to the form.

17 You can answer.

18 THE WITNESS: I don't know.

19 BY MR. NOLAN:

20 Q. Because we agree that the account
21 numbers are the same on both Equifax 30 and 34 for
22 the OCWEN account?

23 A. Yes, based on the document.

24 Q. And Equifax 34 correctly notes
25 Mr. Daugherty as current at that point, correct?

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1 **A. As of January 2013.**

2 Q. All right. So we talked earlier about
3 OCWEN's credit department reinvestigation procedures.
4 And we asked what other information they would look
5 at. Would Rajkumar or Harish Rao have checked
6 Mr. Daugherty's file to see any other disputes or
7 accounts listed during their reinvestigation process?

8 MR. MANNING: Object to the form.

9 You can answer.

10 THE WITNESS: They do check. And
11 they're both the same loan number. Account number is
12 our loan number, OCWEN's loan number.

13 BY MR. NOLAN:

14 Q. Based on these notes, it appears that
15 Mr. Rao's report was entered -- entered notes before
16 Mr. Singh; is that correct?

17 **A. That is correct.**

18 Q. Would Mr. Singh have seen Mr. Rao's
19 dispute resolution notes when reviewing his dispute?

20 **A. Yes.**

21 Q. At that point were there any notes that
22 indicate how he responded to that or how he
23 contemplated a second dispute already processed on
24 this account?

25 **A. Based on the part of the system that**

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1 they use, the credit reporting system section of the
2 system, of the OCWEN system, as I mentioned earlier.
3 Each department has an -- uses a certain
4 department -- each department, for instance, credit
5 reporting, has a credit reporting section of the
6 OCWEN system that they use. The notes, as far as is
7 identified -- anyone can -- an OCWEN employee can
8 view the notes, enter codes to see what was responded
9 previously.

10 And in comparing the two, this is
11 identifying how it was reported back in 2012 as far
12 as delinquent. And Rajkumar reported what was at the
13 time of him responding. So you have two different
14 types of how it was reported delinquent back in 2012
15 versus how it's being reported in 2013 based on
16 currently versus in past.

17 Q. So it's your testimony that OCWEN was
18 not reporting Mr. Daugherty as in foreclosure in
19 2013?

20 A. That is correct.

21 Q. Despite the fact that they verified this
22 form found on Equifax Bates number 30?

23 MR. MANNING: Object to the form.

24 THE WITNESS: Again; it identifies the
25 reporting of January 2012, even though they responded

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1 in 2013. But in 2013 when Rajkumar responded, he was
2 responding as a current status in 2013, which was
3 current.

4 BY MR. NOLAN:

5 Q. Why would Mr. Rao respond as to a prior
6 status on a current dispute?

7 A. I don't know.

8 Q. When Mr. Rao received a dispute March of
9 2013 but the only information in his investigation
10 turned up information from a year ago, in 2012,
11 shouldn't he have investigated further to determine
12 why there was a year's worth of missing information?

13 MR. MANNING: Object to the form.

14 You can answer it.

15 THE WITNESS: I don't know.

16 BY MR. NOLAN:

17 Q. Mr. Rao's notes found on OCWEN 1665
18 state reporting to credit bureau: verified, hence
19 borrow is responsible, correct?

20 A. Yes.

21 Q. They don't see how he verified his
22 research, correct?

23 A. No.

24 Yes, it does. He stated here that the
25 name, the Social Security number -- and he also

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1 checked the signed note and the Social Security, that
2 matches, and he checked the business -- the OCWEN
3 system.

4 Q. Was that Mr. Rao or was that Mr. Singh?

5 A. Mr. Singh.

6 Q. But Mr. Rao didn't leave any notes about
7 his investigation, correct?

8 A. No, other than verified.

9 Q. You were looking at Mr. Singh's
10 verification procedure, and he did make notes that he
11 checked the Social Security number and it indicates
12 borrower signed the note. Does that indicate that he
13 reviewed the note, that Mr. Singh reviewed the note I
14 should say?

15 A. Yes. It does identify that.

16 Q. It says checked CIS. What is the CIS?

17 A. CIS is part of -- a second part of the
18 OCWEN system that image -- has all the images of the
19 documents.

20 Q. And Mr. Singh's report we concluded was
21 accurate, and that Mr. Daugherty was reported as
22 current as of January 2013, correct?

23 A. Yes.

24 MR. NOLAN: Can you staple this and mark
25 this as our next exhibit?

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1 (Exhibit No. 8 was marked for
2 identification.)

3 BY MR. NOLAN:

4 Q. I've just given you some more Equifax
5 ACDV forms. These are dated May -- date created,
6 May 31st, 2013. And that jumps us ahead in the OCWEN
7 note logs to page 1673.

8 Now, to begin, the control number is
9 different, but the subscriber code remains the same
10 as the prior ACDVs we looked at; is that correct?

11 A. Yes.

12 Q. But we still don't know what the
13 subscriber code refers to?

14 A. No. And based on what you're providing
15 to me, that Equifax is sending two requests versus
16 one.

17 Q. Sure.

18 And as we look on this form, Daniel John
19 is the responder name, is that correct, on the
20 Equifax form?

21 A. You mean Daniel Wesley?

22 Q. The Equifax form I was referring to, it
23 says Daniel John, correct?

24 A. Okay.

25 Q. On the OCWEN logs 1673, the date is

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1 6-2-2013 at 11:52 there is a Daniel Wesley?

2 A. Yes. Could be the same person.

3 Q. Okay. And, again, listed there is
4 the -- the initial entry has the control number that
5 corresponds to the Equifax number 62 instead of 60.

6 A. Okay.

7 Q. And, again, 1303.

8 A. Okay.

9 Q. And, again, the note from the -- the
10 dispute from Equifax on the ACDV states a past due
11 amount at this time in the amount of \$6,128, correct?

12 A. The same as the last one.

13 Q. And it notes that foreclosure
14 proceedings are started?

15 A. Same as the last one.

16 Q. And it notes --

17 A. Last one, meaning Exhibit 7.

18 Q. As Daniel reviewed this dispute,
19 investigated it, he notes that the borrower signed
20 the note, hence responsible, Social Security number
21 matches, checked CIS, correct?

22 A. Yes.

23 Q. So he didn't investigate the amounts or
24 the payment history, correct?

25 MR. MANNING: Object to the form.

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1 You can answer if you know.

2 THE WITNESS: Not according to -- not on
3 the note log, but I believe it's shown on the ACDV
4 report back to the bureau.

5 BY MR. NOLAN:

6 Q. What shows on the report back to the
7 bureau?

8 A. **What was verified.**

9 Q. Okay. And his investigation was based
10 on the dispute code of 001, not his/hers, correct?

11 A. **That is correct.**

12 Q. But he, again, confirmed that there was
13 a \$6,128 delinquency on Mr. Daugherty's --

14 MR. MANNING: Object to the form.

15 Sorry. Didn't mean to interrupt.

16 Object to the form.

17 You can answer.

18 THE WITNESS: He verified based on the
19 dispute that came in. This is not -- again, this is
20 an Equifax form. This is not the actual form that is
21 received to OCWEN. Everything is -- everything is
22 communicated through e-Oscar.

23 BY MR. NOLAN:

24 Q. Correct.

25 A. **Okay.**

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1 Q. So when you say form, did Equifax send a
2 piece of paper?

3 A. Well, this is a form. This is a form.

4 Q. This is a printout?

5 A. This is a printout of a form of
6 Equifax's records. Again, OCWEN uses e-Factor.
7 Everything is electronically automated received. And
8 the notes stipulate that.

9 Q. Does e-Factor accept automated consumer
10 dispute verifications?

11 A. e-Factor --

12 MR. MANNING: You said e-Factor. You
13 meant e-Oscar, right?

14 BY MR. NOLAN:

15 Q. I thought we were getting into a new
16 system here. So let me back that up then.

17 Equifax sends OCWEN ACDVs to review for
18 consumer disputes, correct?

19 A. OCWEN reports on a monthly basis to the
20 national credit bureaus. ACDVs are normally what
21 comes in from the bureaus in regards to a dispute and
22 verification.

23 Q. Is the information contained on the ACDV
24 that Equifax sends altered in any way when it -- by
25 the time it reaches OCWEN --

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1 MR. MANNING: Objection.

2 BY MR. NOLAN:

3 Q. -- through the e-Oscar system?

4 MR. MANNING: Object to the form. It
5 calls for speculation.

6 You can answer.

7 THE WITNESS: Equifax has to input the
8 information into e-Oscar.

9 BY MR. NOLAN:

10 Q. And once that information is input, is
11 that the information OCWEN receives?

12 A. Then that's the information OCWEN
13 receives.

14 Q. I ask that because you state that this
15 is an Equifax form, which is true. Would OCWEN have
16 anything different when they're reinvestigating a
17 dispute, besides what's contained on this form?

18 MR. MANNING: Object to the form.

19 You can answer.

20 THE WITNESS: I don't know. Unless
21 something is sent to the credit reporting department
22 directly, with any proof to back it up, for further
23 investigation. But based on what is received through
24 e-Oscar is what is being reviewed initially based on
25 that dispute and responded back through e-Oscar back

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1 to the national -- the credit agencies.

2 BY MR. NOLAN:

3 Q. When would they get additional
4 information?

5 A. Unless they receive something directly.

6 Q. From a credit reporting agency?

7 A. From a credit -- if they receive
8 anything.

9 Q. And then once OCWEN receives the ACDV,
10 OCWEN has information it needs to complete on the
11 form, as well?

12 A. Right. So everything here is based on
13 the information that they receive from e-Oscar.

14 Q. And in this case, on Equifax 62 it
15 remarks that OCWEN verified that the date open on
16 this account was August 1, 1999 and that the account
17 was currently in foreclosure, correct?

18 MR. MANNING: Object to the form.
19 Misstates testimony.

20 You can answer.

21 THE WITNESS: Are you looking at the
22 note log?

23 BY MR. NOLAN:

24 Q. I'm looking at the Equifax form.

25 A. The Equifax form speaks for itself.

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1 **Again, this is an Equifax communication for their**
2 **note log.**

3 Q. And I'm looking at OCWEN's log now. It
4 states on the entry date of June 2nd, 2013 at
5 11:52:13 p.m. that Daniel was able to -- Daniel noted
6 borrower has signed the note, hence responsible, and
7 confirmed that this report was verified as reported,
8 correct?

9 MR. MANNING: Object to the form.
10 Misstates the testimony.

11 You can answer.

12 THE WITNESS: The note log -- the note
13 log identifies the borrower, the Social Security, and
14 verifies what he did. Borrower has signed the note.
15 The Social Security number matches. And he's also
16 checked CIS.

17 BY MR. NOLAN:

18 Q. And he verified the dispute contained in
19 control number 99993151006543103, correct?

20 A. **He checked and verified as reported**
21 **based on what was received.**

22 Q. And then we look on the next comment
23 log, page 1674. Now, this is Daniel Wesley again,
24 two minutes later, at 11:54:22 p.m., on the same
25 date, received another automated CDV with the control

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1 number ending in 102, correct?

2 A. Yes.

3 Q. It's got the same subscriber code as the
4 previous control number dispute, correct?

5 A. Yes.

6 Q. And he was able to verify this dispute
7 as accurate, as well?

8 A. Yes.

9 Q. Now, the same OCWEN employee responded
10 to two separate disputes within two minutes, correct?

11 A. Yes.

12 Q. Both disputes regarded the same account
13 number, correct?

14 A. Correct.

15 Q. Both disputes contained different
16 reports, though, correct?

17 A. Based on what was received.

18 Q. How was Mr. Johnson able to verify both
19 reports?

20 MR. MANNING: Object to the form.

21 You can answer.

22 THE WITNESS: Depending on how it's
23 received and how it's disputed to each employee. He
24 just happened to receive both the disputes, and he
25 worked on both of them.

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1 BY MR. NOLAN:

2 Q. And his reinvestigation consisted of
3 checking to see whether the borrower signed the note,
4 Social Security number matches, and checked CIS,
5 correct?

6 A. Correct.

7 Q. And that was the same investigation he
8 performed for both disputes on that date, correct?

9 A. The second time he went to a prior
10 servicer's system and reverified. And for Exhibit 8,
11 both disputes came in only as not his/hers, provide
12 or confirm complete ID.

13 Q. Okay. The OCWEN responder was again
14 able to verify two separate disputes with the same
15 account number, even though they had different dates
16 open, different current balances, different past due
17 amounts, and different comments?

18 A. This is --

19 MR. MANNING: Object to the form.
20 Misstates the testimony.

21 You can answer.

22 THE WITNESS: As I mentioned earlier,
23 two separate -- two separate requests on disputes
24 were received by Equifax, and it was responded by how
25 the request was received, so it was responded back to

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1 Equifax twice.

2 BY MR. NOLAN:

3 Q. I want to back up to the OCWEN comment
4 log, if we could. Back to 1666 now, on March 21st,
5 2013 at 2:05:11 a.m. Anjali Balakrishnan -- I
6 apologize for the pronunciation -- received another
7 ACDV, correct?

8 A. Yes.

9 Q. This ACDV had a different subscriber
10 code, correct?

11 A. Yes, on how it was received.

12 Q. Can you tell us why there would be a
13 separate subscriber code received at OCWEN from
14 Equifax?

15 A. No. This is how it was received. And
16 this is how it was inputted in the system.

17 Q. So even though OCWEN had already
18 received two disputes on this account, a third
19 dispute came in with a new subscriber code, correct?

20 A. However the dispute -- however it came
21 in, that's how each -- as I mentioned earlier, each
22 dispute that comes in gets noted to the account being
23 received.

24 Q. I don't have this specific date report
25 here, but I just want to ask about this.

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1 MR. NOLAN: Mark this as an exhibit.

2 (Exhibit No. 9 was marked for
3 identification.)

4 BY MR. NOLAN:

5 Q. This is a dispute response from OCWEN to
6 Equifax, I believe, and it's dated at the top
7 right-hand of September 2014. I just want to
8 identify the subscriber code as 605FM50178. Is that
9 the same account listed in the OCWEN comment log at
10 1666?

11 A. I'm not sure I follow -- oh. Here it
12 is.

13 Q. The bottom of the top box.

14 A. I see it. Okay.

15 Q. Am I correct -- the account number is
16 12907408, correct?

17 A. Yes. That looks to be the prior
18 servicer's number.

19 Q. So am I correct --

20 A. Litton --

21 Q. I presume this is from Litton Loan's
22 accounts reporting?

23 A. Correct.

24 Q. Toward the bottom of 1666, the dispute
25 notes that Litton Loan information updated as per

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1 LSAMS and RADAR.

2 A. What date are you looking at?

3 Q. I'm sorry. I am at March 21st, 2013 at
4 2:05 from Anjali Balakrishnan.

5 A. What are the seconds? Because they're
6 both at the same time.

7 Q. 2:05:18.

8 A. Okay.

9 Q. And the last entry on that note states
10 information updated as per LSAMS and RADAR.

11 My question is, can you tell me what is
12 LSAMS?

13 A. LSAMS, those are -- and RADAR is the two
14 OCWEN systems, as it says here. Litton Loan
15 information updated per -- that's the systems that
16 Litton Loan Servicing used.

17 Q. That's how data is archived for OCWEN to
18 review?

19 A. That is correct.

20 Q. If we go to the next page of the comment
21 log, 1667, halfway down, on March 21st, 2013 at
22 11:21:05 p.m. Rajkumar Singh receives another ACDV
23 with a different subscriber code, correct?

24 A. Yes.

25 Q. And in his notes it refers to Litton

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1 Loan information updated per LSAMS and RADAR,
2 correct?

3 **A. Yes.**

4 Q. Was the subscriber -- was this dispute
5 likely referring to a prior Litton listing?

6 **A. Well, this loan -- this loan came from**
7 **Litton Mortgage, so as far as the identification, if**
8 **it's identifying a Litton -- an account number**
9 **129074808, I don't know, but it is part -- part of**
10 **this loan.**

11 Q. Then on comment log page 1668, halfway
12 down, at March 25th, 2013 at 3:24:59 a.m. there is an
13 entry from Harish Rao that has a different subscriber
14 code of 813P004.

15 **A. Okay.**

16 Q. Again, you don't know what the
17 subscriber code refers to?

18 **A. No.**

19 Q. Would anyone at OCWEN be able to tell us
20 what the subscriber code refers to?

21 **A. Yes.**

22 Q. Can you tell us who we should be able to
23 direct that question to?

24 **A. I can get that information.**

25 Q. Again, I don't have the specific

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